

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
JOANN INC., <i>et al.</i> ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 1052

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' SECOND
OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)
(Cross-Debtor Duplicate Claims & Reclassified Claims)**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On May 30, 2025, the *Debtors' Second Omnibus Objection to Certain Claims (Substantive) (Cross-Debtor Duplicate Claims & Reclassified Claims)* [Docket No. 1052] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the “Proposed Order”).

2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was June 20, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. Prior to the Response Deadline, the Debtors received an informal response to the Objection and Proposed Order from counsel to Constellation NewEnergy and Constellation NewEnergy – Gas Division (collectively, “Constellation”).

4. The Debtors have not received any other responses to the Objection and Proposed Order.

5. To resolve Constellation’s informal response, the Debtors and Constellation agreed to a revised Proposed Order, a copy of which is attached hereto as **Exhibit A** (the “Revised Proposed Order”).

6. The Debtors respectfully request that the Court enter the Revised Proposed Order at its earliest convenience.

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Dated: July 9, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

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